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6 ENDURANCE AMERICAN
SPECIALTY INSURANCE
7 COMPANY

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 COMMISSIONER OF INSURANCE FOR
THE STATE OF NEVADA AS RECEIVER
11 OF LEWIS AND CLARK LTC RISK
RETENTION GROUP, INC.,

12 Plaintiff,

13 v.

14 IRONSHORE SPECIALTY INSURANCE
COMPANY; INDIAN HARBOR INSURANCE
15 COMPANY f/k/a CATLIN INSURANCE
COMPANY INC.; ILLINOIS NATIONAL
16 INSURANCE COMPANY; RSUI
INDEMNITY COMPANY; ENDURANCE
17 AMERICAN SPECIALTY INSURANCE
COMPANY; US RE CONSULTING AGENCY
18 SERVICES, INC., a Nevada corporation; UNI-
TER UNDERWRITING MANAGEMENT
19 CORP., UNI-TER CLAIMS SERVICES CORP.,
U.S. RE CORPORATION; LEWIS & CLARK
20 LTC RISK RETENTION GROUP INC., a
Nevada corporation; TAL PICCIONE, an
21 individual; DOES 1 through 100, and each of
them, inclusive; ROE COMPANIES 1through
22 100, and each of them, inclusive,

23 Defendants.

Case No. 2:25-cv-00789

STIPULATION EXTENDING
DEFENDANT'S TIME TO
RESPOND TO COMPLAINT

24 IT IS HEREBY STIPULATED AND AGREED by and between the undersigned
25 attorneys for Plaintiff and Defendant Endurance American Specialty Insurance Company
26 ("Endurance") that Endurance's time to answer, move against or otherwise respond to the
27 Complaint filed in this action is extended to and including June 23, 2025. By entering into this
28 stipulation, Plaintiff does not waive, or intend to waive, any rights in this matter, including, without

1 limitation, any and all rights related to Plaintiff's ability to seek remand of this matter to Eighth
2 Judicial District Court in Nevada, pursuant to 28 U.S.C. Section 1447, or any other right or remedy,
3 which Plaintiff expressly reserves. Likewise, by entering into this stipulation, Endurance does not
4 waive, or intend to waive, any rights in this matter, and expressly reserves all of its defenses,
5 objections, remedies to the Complaint or otherwise.

6 DATED this 23rd day of May, 2025.

7 WIRTHLIN & VERLAINE

THORNDAL ARMSTRONG, PC

8 */s/ Brenoch Wirthlin*

/s/ Philip Goodhart

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14 **ORDER**

15 IT IS SO ORDERED.

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17 
UNITED STATES MAGISTRATE JUDGE

19 **Date:** May 23, 2025